

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**ANKUS, L.L.C.,**

*Plaintiff,*

**v.**

**PHH MORTGAGE CORP. AND USAA  
FEDERAL SAVINGS BANK,**

*Defendants.*

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**CIVIL ACTION NO. 4:22-cv-00355**

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**UNOPPOSED MOTION TO ENLARGE DEADLINE TO  
ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

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Defendant USAA Federal Savings Bank (“Defendant”) files this Unopposed Motion to Enlarge Deadline to Answer or Otherwise Respond to Amended Complaint (“Unopposed Motion”), and respectfully shows the Court as follows:

Defendant moves the Court to extend its deadline to answer or otherwise respond to Plaintiff Ankus, L.L.C.’s (“Plaintiff”) First Amended Petition and Application for Temporary Restraining Order (Doc. No. 1-9) (the “Amended Complaint”) up to and including April 25, 2022. Plaintiff has agreed to the requested extension and does not oppose the relief sought herein. Accordingly, Defendant moves the Court to extend its deadline to answer or otherwise respond to the Amended Complaint up to and including April 25, 2022.

The relief requested in this Unopposed Motion is not sought for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that the Court grant its Unopposed Motion, extend the deadline for Defendant to answer or otherwise respond to the Amended Complaint up to and including April 25, 2022, and grant Defendant such other and further relief as this Court deems just and proper under the circumstances.

**UNOPPOSED MOTION**

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Respectfully submitted,

/s/ Elizabeth Hayes

**Marc D. Cabrera**

State Bar No. 24069453

Southern Bar No. 1093318

mcabrera@polsinelli.com

**Elizabeth Hayes**

State Bar No. 24069001

Southern Bar No. 2964103

ehayes@polsinelli.com

**POLSINELLI PC**

2950 N. Harwood Street, Suite 2100

Dallas, TX 75201

T: (214) 397-0030

F: (214) 397-0033

**ATTORNEYS FOR DEFENDANT  
USAA FEDERAL SAVINGS BANK**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendant conferred with counsel for Plaintiff regarding the relief sought herein and that Plaintiff agreed, and is unopposed, to the relief sought herein.

/s/ Elizabeth Hayes

Attorney for Defendant USAA Federal Savings  
Bank

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on February 25, 2022, on all counsel of record via the Court's CM/ECF system pursuant to the Federal Rules of Civil Procedure.

/s/ Elizabeth Hayes

Attorney for Defendant USAA Federal Savings  
Bank